

STATE OF COLORADO

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Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department
of Public Health
and Environment

October 4, 2005

Mr. John J. Rampe
Director, Project Management Division
U.S. Department of Energy, Rocky Flats Project Office
12101 Airport Way, Unit A
Broomfield, Colorado 80021-2583

Mr. Stephen Nesta
Environmental Manager
Kaiser-Hill Company, RISS
Rocky Flats Environmental Technology Site
12101 Airport Way, Unit B
Broomfield, Colorado 80021-2583

**RE: Acceptance, Closure Summary Reports (CSR) for Partial Closure of RCRA Unit 374.3 - 400 Area
 and Closure of RCRA Unit 374.3 - 700-800 Area Process Waste Transfer System**

Dear Mr. Rampe and Mr. Nesta:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division") previously received the CSR for the 400 Area, dated June 26, 2003, and received an additional CSR for the 700-800 Area, dated August 23, 2005. The 400 Area report, a partial closure of Unit 374.3, has now been reviewed in conjunction with the 700-800 Area report. Both reports were found to be acceptable with the following notations.

The Division received a Closure Description Document (CDD) for the 400 Area, dated April 22, 2002, and granted conditional approval of the CDD on May 24, 2002. The Division also received a CDD for the 700-800 Area, dated January 23, 2003, and granted conditional approval of that CDD on June 13, 2003. The Division reviewed both CDDs, and the conditions of approval, to determine the acceptability of the CSRs.

The 700-800 Area CSR inadvertently included all of the 300-500 Area previously included in the 100-400 Area CSR. The greater portion of the 300-500 Area portion of the transfer system, inclusive of Valve Vaults (VV) 10 through 13, and associated piping from the 700-800 Area to Building 374, were incorporated into the 700-800 Area CDD. However, the lesser portion of the 300-500 Area transfer system, from VV 13 through VV14 into the 100-400 Area, were incorporated into the 100-400 Area CDD. While minor, the Division's acceptance of the CSRs is based on the partitioning of the transfer system as provided in the approved CDDs.

After reviewing the reports individually, the Division has determined that the conditions of approval have been met. For the 100-400 Area, noteworthy conditions were addressed as follows:

- Portions of primary lines that previously leaked, or leaked during contamination efforts, were removed along with their secondary lines rather than being clean-closed.
- Relative to beryllium, the line originating from Building 460 was removed. Analytical data included beryllium for clean closed lines along the route to B374.
- The Division accepts the PE certification for the closure of the waste transfer system as sufficient. DOE certification, as owner, for closure of the entire RCRA facility, currently in preparation and upon acceptance by the Division, is expected to meet the condition of the CDD approval.

The PE certification for the 100-400 Area states closure activities were conducted consistent with the approved CDD. However, planned actions by the Environmental Restoration Group to remove four sections of the transfer system were outstanding on the date of certification. Therefore, the Division accepts the certification as related to the clean closure of the portions of the transfer system left in place. Certification is not required for the portions that were removed and disposed as waste.

For the 700-800 Area, noteworthy conditions were addressed as follows:

- Portions of primary lines that previously leaked, or leaked during contamination efforts, were removed along with their secondary lines rather than being clean-closed.
- Analytical data supporting clean closure included hazardous waste constituents for the specified P and U hazardous waste codes as agreed in a contact record (S. Nesta to J. Hindman) dated April 7, 2003.
- The Division accepts the PE certification for the closure of the waste transfer system as sufficient. DOE certification, as owner, for closure of the entire RCRA facility, currently in preparation and upon acceptance by the Division, is expected to meet the condition of the CDD approval.

Figure 1 indicates that the line from Building 559 was not part of Unit 374.3 and was left in place. We agree that that portion of the transfer system line was not part of the system but was removed for practical reasons after specific RCRA closure activities had been completed. The line from Building 566 is correctly represented as non-RCRA and was left in place.

Lastly, discrepancies between Figure 1 and Attachment 2 of the 700-800 Area CDD were resolved. Figure 1 correctly excludes an OPWL line from B779 to B776. Further, it correctly shows lines originating in B881, becoming a single line in B887 and extending back through the west side of B881 to Valve Vault 1.

If you have any questions concerning this correspondence, please contact me at 303-692-3367 or Harlen Ainscough at (303) 692-3337.

Sincerely,



David A. Kruchek
Acting Rocky Flats Oversight Unit Leader

cc: M. Aguilar, USEPA Region VIII
D. Miller, AGO
Administrative Record, Mountain View

S. Garcia, City of Broomfield
David Ward, K-H Team